

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY  
CAMDEN VICINAGE**

**IN RE: VALSARTAN, LOSARTAN,  
AND IRBESARTAN PRODUCTS  
LIABILITY LITIGATION**

**This Document Relates to All Actions**

MDL No. 2875

Honorable Robert B. Kugler,  
District Court Judge

**JOINT MOTION FOR MODIFICATION OF CASE MANAGEMENT  
ORDER NO. 23**

Plaintiffs and Defendants (collectively “the Parties”) jointly move the Court for a brief extension of the remaining deadlines in the operative Scheduling Order (Case Management Order No. 23 Revised) (ECF No. 1679) to complete the depositions of Defendants’ class certification experts; the Parties’ class certification briefing; and briefing related to any Daubert motions regarding class certification experts.

The operative Scheduling Order contains the following deadlines applicable to the present motion:

- March 10, 2022 - Deadline to complete depositions of defendants’ class certification experts.
- March 22, 2022 - Deadline for defendants to file responses to class certification motions.
- April 12, 2022 - Deadline to file Daubert motions regarding class certification experts.

- April 19, 2022 - Deadline for plaintiffs to file replies to responses to class certification motions.
- May 11, 2022 - Deadline to file responses to Daubert motions regarding class certification experts.
- May 25, 2022 - Deadline to file replies to responses to Daubert motions regarding class certification experts.

There is good cause to revise the schedule by extending the foregoing briefing deadlines by two weeks. The primary reason for the extension is to accommodate the recently-scheduled Daubert hearings as to the Parties' general causation experts, which was not previously included in the Scheduling Order. The Court has set the Daubert hearings for March 2, 3, 14, and 15, with declarations for all expert witnesses to be presented at those hearings to be produced by February 24, 2022. A short, two-week extension of the class certification briefing deadlines will provide the additional time necessary for the parties to fully and adequately brief the important class certification issues in light of the Daubert hearings. Additionally, the scheduling of the Daubert hearings has necessitated moving multiple scheduled depositions of defendants' class certification experts, including rescheduling depositions after the current deadline of March 10, 2022. A two-week extension will account for these scheduling changes.

The proposed extension will not prejudice the Parties or these proceedings. The two-week extension is short and will not disrupt any scheduled trial or other proceedings in connection with this matter. The Court previously granted an

extension of one week to Plaintiffs to file their class certification motions (*see* ECF No. 1679). The Parties have conferred and agree to the proposed revised schedule enumerated in the Proposed Order filed herewith.

WHEREFORE, for the foregoing reasons, the Parties respectfully request that Case Management Order No. 23 be revised as reflected in the attached Proposed Order.

Dated: February 22, 2022

/s/ Adam M. Slater

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**CERTIFICATE OF SERVICE**

The undersigned attorney certifies that on February 22, 2022, she served the foregoing Joint Motion for Modification of Case Management Order No. 23 electronically through the court's CM/ECF system, which will automatically send notification to all parties who have appeared and are registered on the CM/ECF system.

By: /s/ Coleen W. Hill